

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, TYLER MAGILL, APRIL  
MUNIZ, HANNAH PEARCE, MARCUS  
MARTIN, JOHN DOE, JANE DOE 1, JANE  
DOE 2, and JANE DOE 3,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSELY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, MICHAEL “ENOCH”  
PEINOVICH, LOYAL WHITE KNIGHTS OF  
THE KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**STIPULATION**

Pursuant to the Local Rules of this Court, Plaintiffs Sines et al., by counsel, respectfully advise the Court that all parties who have properly appeared in this action<sup>1</sup> agree to submission of Plaintiffs' Motion to Preclude Defendant Peinovich from Recording Parties' Discovery Negotiations, filed on November 29, 2017, without a hearing.

Dated: December 18, 2017

Respectfully submitted,

s/ Robert T. Cahill

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<sup>1</sup> Pursuant to Plaintiffs' Motion to Strike Defendant Loyal White Knights of the Ku Klux Klan's Answer, ECF No. 155, Plaintiffs do not consider the Loyal White Knights of the KKK to have properly appeared in this action.

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*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2017, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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I further hereby certify that on December 18, 2017, I also served the following non-ECF participant, via e-mail:

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I further hereby certify that on December 18, 2017, I also served the following non-ECF participant, via U.S. mail, First Class and postage prepaid, addressed as follows:

Loyal White Knights of the Ku Klux Klan  
a/k/a Loyal White Knights Church of Invisible Empire Inc.  
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